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March 13, 2023

**VIA ECF**

Special Master the Honorable Thomas Vanaskie  
Stevens & Lee  
1500 Market Street, East Tower  
18th Floor  
Philadelphia, PA 19103

**Re: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation**  
**Case No. 1:19-md-02875-RBK-JS**

Dear Special Master Vanaskie:

This letter is to provide Defendants' position with respect to the sole topic on the agenda for the Teleconference with Your Honor on March 15, 2023. The parties do not expect the need to discuss any confidential materials as part of this agenda item.

**1. Defendants' Request to Meet and Confer on Product Preservation**

Defendants may require the Court's assistance in addressing an issue raised by Defendant ZHP with Plaintiffs' counsel regarding the scope of ongoing retention of API and finished product. To the extent this request can be resolved prior to Wednesday's teleconference we will promptly advise Your Honor.

Respectfully submitted,

/s/ Victoria Davis Lockard

Victoria Davis Lockard



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cc: Adam Slater, Esq. (*via email, for distribution to Plaintiffs' Counsel*)  
Jessica D. Miller, Esq. (*via email, for distribution to Defendants' Counsel*)  
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